

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

STATE OF MISSOURI ex rel. ERIC S.  
SCHMITT, Attorney General, and

STATE OF LOUISIANA ex rel. JEFFREY  
M. LANDRY, Attorney General,

*Plaintiffs,*

v.

JOSEPH R. BIDEN, JR., in his official  
capacity as President of the United States, *et  
al.*;

*Defendants.*

Case No. 3:22-cv-01213

**DECLARATION OF MARK CHANGIZI**

1. I, Mark Changizi, am over the age of 18.

2. I live in Columbus, Ohio.

3. I make this Declaration based on personal knowledge.

4. I am a broadly trained scientist (math/physics undergrad, PhD in math, postdocs in psychology and theoretical neuroscience) and have been a researcher in a variety of fields for 25 years. For more than 15 years I have been a public-facing scientist -- I write for magazines, appear on science TV shows, speak worldwide, do a YouTube series, and have six books on my research.

5. Historically apolitical, when Covid entered the picture I realized there were many deep misunderstandings of the data and evidence leading to panicked decisions being made, and I endeavored to explain what the evidence actually says.

6. Furthermore, as someone with expertise on psychology and the evolution of culture, I have also been spending considerable effort communicating emergent societal

phenomena, the illogical biases humans have (on both sides of the Covid debate), and the importance of free expression in society (the subject of my institute, Free Expression Group).

7. I have approximately 37,000 followers on Twitter, having created my account in April 2013.

8. Since March of 2020, my Twitter account focused upon criticizing the societal and governmental responses to COVID-19, and trying to explain why they were misguided.

9. Many of my Tweets were extremely controversial, particularly at the time, but I was never suspended for any of them.

10. I tweeted on March 17, 2020, for example: “the moral of coronavirus19 will be that social contagion via social networks is more dangerous than biological contagion” (Attachment 1).

11. On April 27, 2020 I tweeted that “Lockdowns were NOT common sense measures. They were hysterical reactions out of fear” (Attachment 2).

12. On May 24, 2020 I tweeted: “The Lockdown religious cult. Believed initially on faith (“common sense”); impervious to evidence they did nothing; Demand that all else must be sacrificed; Requires unrelenting devotion and asceticism; Promises forever life; Moral outrage for any who protest” (Attachment 3).

13. On July 23, 2020, I tweeted “New study a TOTAL surprise to sufferers of The Illusion of Control. ‘Rapid border closures, full lockdowns, & wide-spread testing were not associated with COVID-19 mortality per million people’” (Attachment 4).

14. On September 9, 2020, I tweeted that the infection fatality rate for the flu in the United States ranges from 0.1% to 0.18%, while COVID was in the range of 0.1% to 0.3% (Attachment 5).

15. On November 21, 2020 I tweeted “Breaking: Another study finds no benefit from lockdowns” (Attachment 6).

16. On December 2, 2020, I tweeted that “ASYMPTOMATIC TRANSMISSION RATE. Transmission rate increased with the severity of index cases,” and cited some statistics (Attachment 7).

17. That same day, I tweeted that covid “spread via smoke like aerosols” which is “why masks are useless” (Attachment 8).

18. On April 20, 2021, I received my first 12-hour suspension for linking to an article on the safety and efficacy of face masks, an article housed at the NIH web site. The following tweet was cited as cause:

New Review: Masks Ineffective, Harmful. “The existing scientific evidence challenges the safety and efficacy of wearing facemask as preventive intervention for COVID-19” (Attachment 9).

19. On approximately June 25, 2021, I received a 7-day suspension, and the email from Twitter just had blank spaces where the usual offending material would be, so I was never sure why I was suspended.

20. Around December 1, 2021, I learned my account was being heavily censored and deboosted (this means, among other things, that the user’s tweets are de-platformed—they appear in Twitter feeds much less frequently and replies to other posts may be hidden).

21. First, I had noticed that I was no longer gaining followers, and my engagement had fallen precipitously.

22. Second, followers reported to me that they were no longer seeing my tweets, and that when they searched for me I would either not come up or appear only when the final letter

was added, and -- if they did find me via a search -- that my account was labeled as “sensitive” and required accepting a warning in order to view the content.

23. I was permanently suspended on December 18, 2021, again for “spreading misleading and potentially harmful information related to COVID-19.” The following two tweets were cited as the cause (Attachment 10):

- a. “Covid is 10 to 20 times less dangerous than flu for kids. Get. A. Grip. There is NO long term data for the shot. And even the short and medium term data for that age group are ambiguous at best.”
- b. “Asymptomatics rarely spread it ~ Vaccinations don’t slow spread ~ unvaxed pose no threat to vaxxed ~ Risks are broadly flu like (and safer than flu for &lt; 40) ~ Huge % of unvaxxed have superior natural immunity via recovery.”

24. The email warned me that any “attempt to evade a permanent suspension by creating new accounts” would result in suspension of those accounts.

25. I appealed the suspension on Christmas Day of 2021. I wrote that:

You have permanently suspended me for speaking out as a scientist concerning the evidence-based dangers of Covid and the efficacy & ethics of the interventions.

Ironically, I am one of the few scientists studying the importance of free expression, and how it is an absolutely crucial part of the mechanism society — and science — uses to stumble toward the truth.

I am an academic with a number of well-known discoveries, my sixth book appearing in a few months, and am also perhaps the only person arguing against the interventions that understands there was no “plandemic,” and has tried to educate people against their bias toward conspiracy-theory thinking.

You have made a huge mistake in suspending so many voices, including mine.

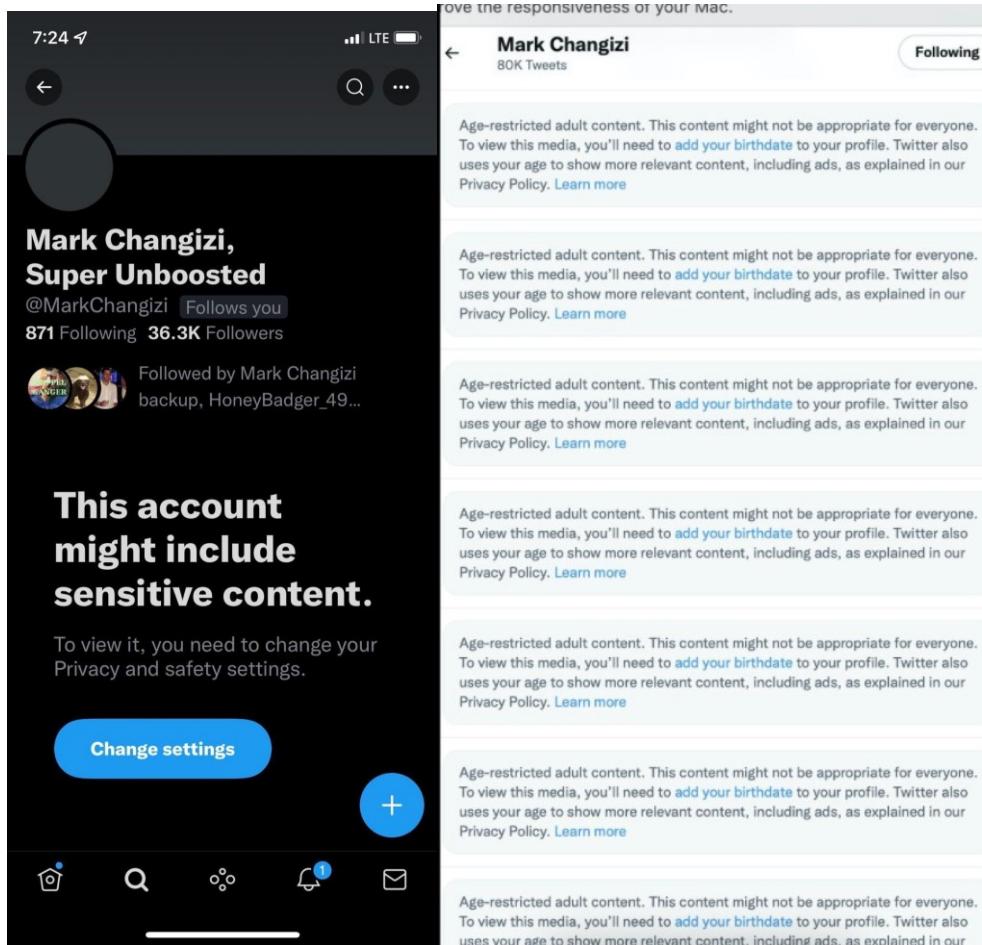
And, that is true whether or not what we're saying is true! Of course, I believe my statements are true, and always provide argument & evidence. Remember: nearly every journal article in the academic literature is false. But that doesn't mean it gets cancelled. It is part of the truth-discovery process itself.

Don't become part of the problem by encouraging censorship and groupthink.

26. On December 27, 2021, Twitter unsuspended me without explanation, although I had to delete two Tweets (see 9a and 9b) to regain access to my account.

27. Nevertheless, my account is heavily censored: my Tweets are typically labeled "age-restricted adult content" that require an explicit effort to read them (in contrast to the vast majority of Twitter accounts). I still do not occur in a search unless my name is fully typed, and the same is true of my Instagram account (Attachment 11).

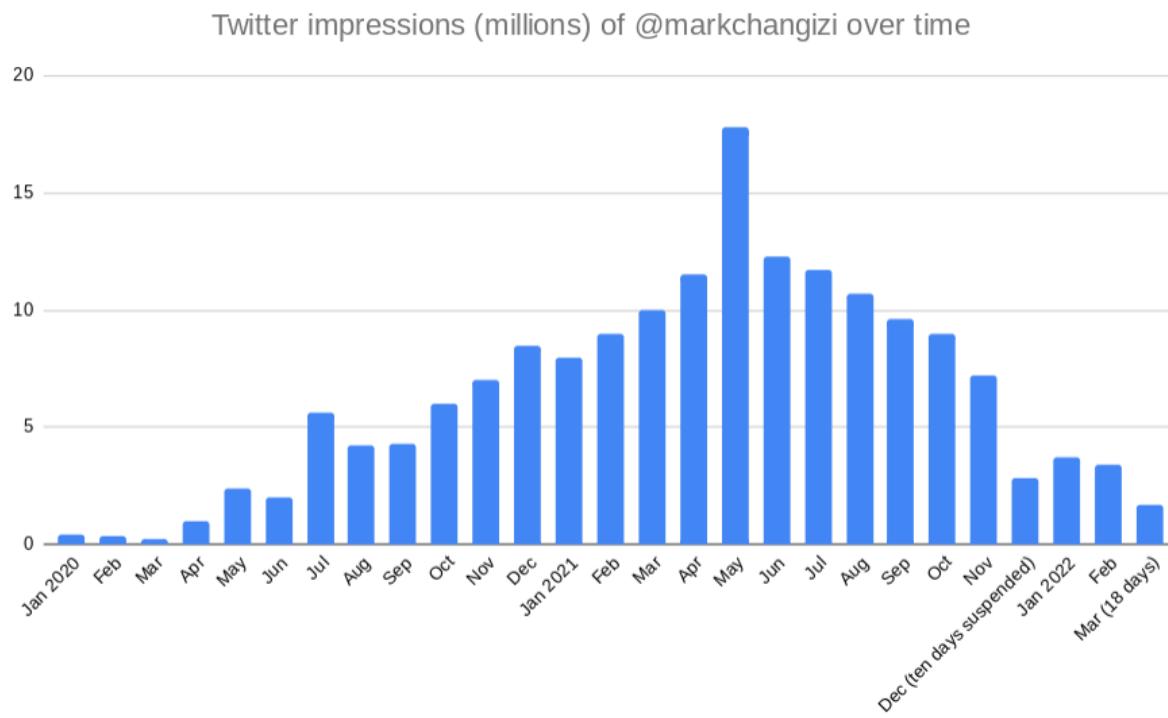
28. By November to December of 2021 others began telling me that my account was being labeled as "sensitive content" (below, left) and my tweets were labeled as sensitive (below, right).



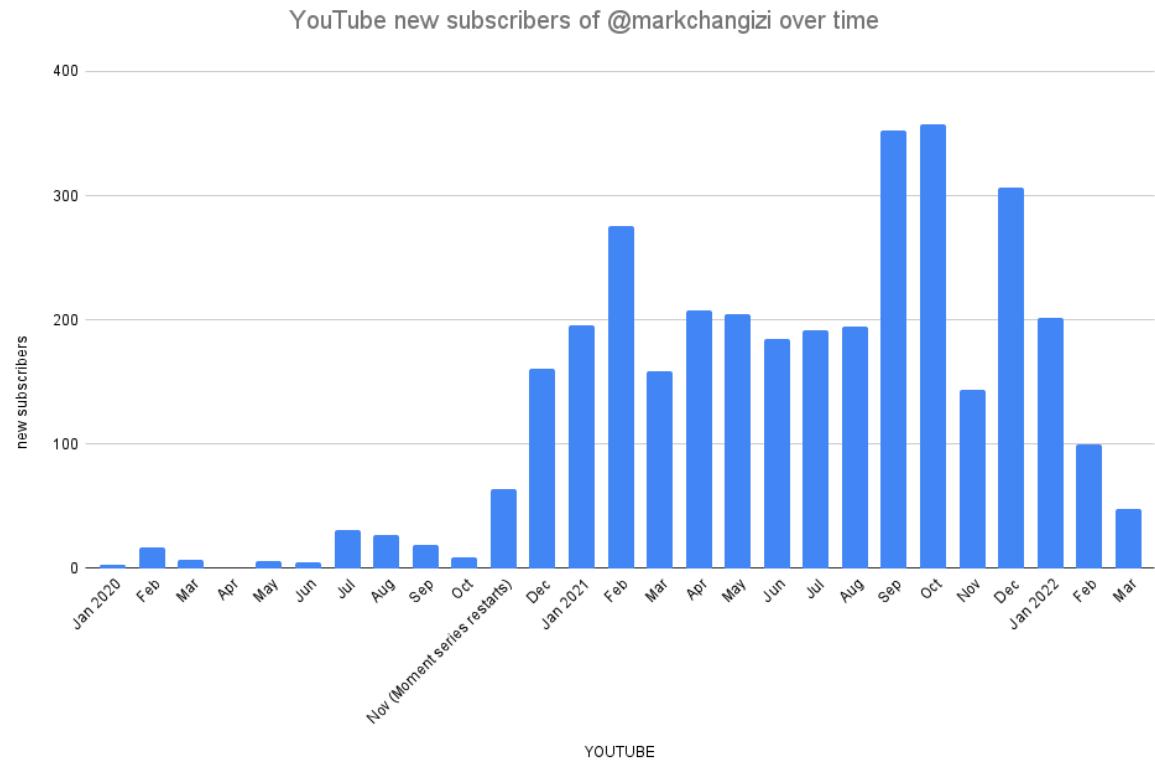
29. Through these (and presumably other in-house mechanisms of censoring my account), my monthly Twitter impressions (the number of times someone sees my posts) precipitously fell, as can be seen below in a graph of monthly impressions from January 2020 until the time of this writing.

30. Although I began noticing my general de-platforming around December of 2021, it had actually begun significantly earlier, around May of 2021 (as can be seen in the graph below). My

activity (number of tweets) did not wane during this period.



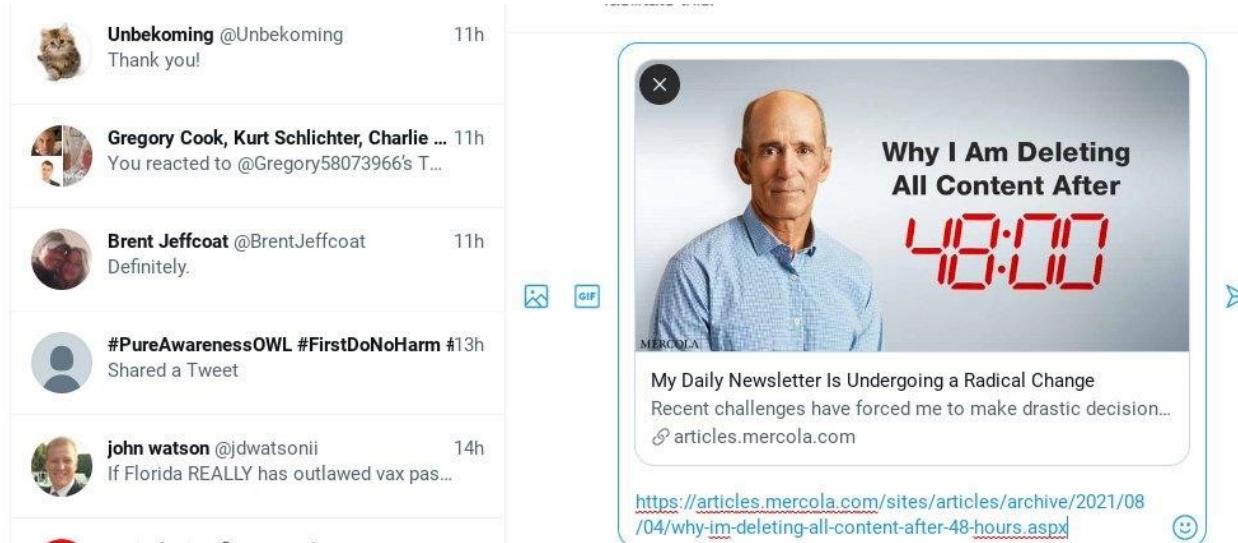
31. My follower-ships at YouTube also plateaued and reversed despite the fact that I was very active, and prior to the censorship period had steadily gained followers (see graph below).



32. Twitter is also censoring my direct messages, which are non-public messages between specific users of Twitter.

33. The first screenshot below shows my direct message before clicking “send”. The second screenshot shows what one sees after clicking “send”: Twitter prevented me from sending the link, as one can see in the temporary blue message and red “failed to send” state of the DM. This DM

censorship occurred in early August, 2021.



Unbekoming @Unbekoming 11h  
Thank you!

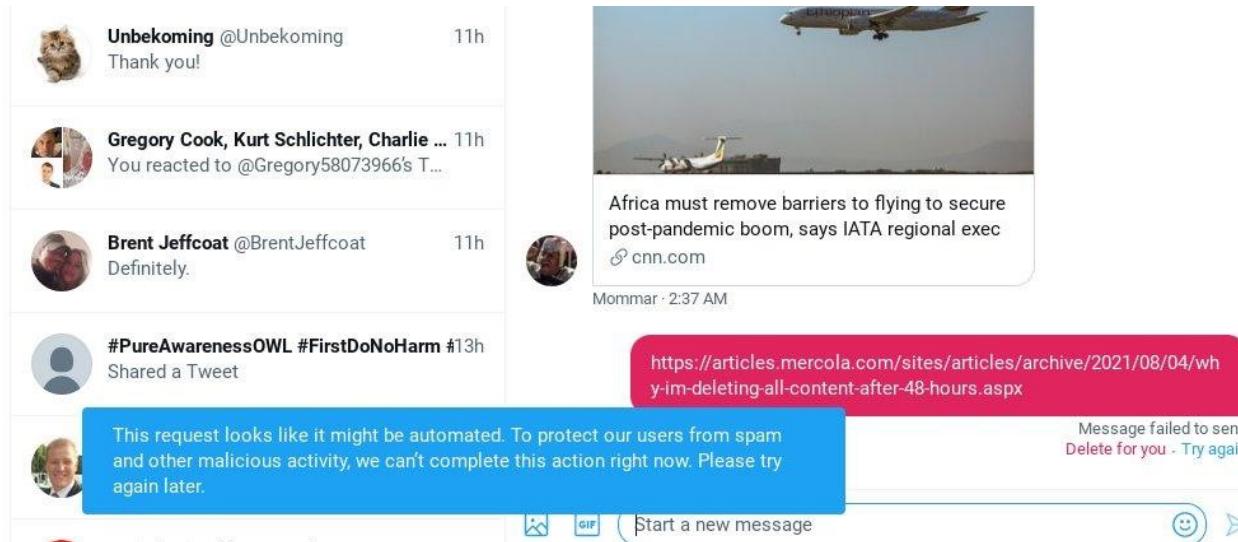
Gregory Cook, Kurt Schlichter, Charlie ... 11h  
You reacted to @Gregory58073966's T...

Brent Jeffcoat @BrentJeffcoat 11h  
Definitely.

#PureAwarenessOWL #FirstDoNoHarm #13h  
Shared a Tweet

john watson @jdwatsonii 14h  
If Florida REALLY has outlawed vax pas...

<https://articles.mercola.com/sites/articles/archive/2021/08/04/why-im-deleting-all-content-after-48-hours.aspx>



Unbekoming @Unbekoming 11h  
Thank you!

Gregory Cook, Kurt Schlichter, Charlie ... 11h  
You reacted to @Gregory58073966's T...

Brent Jeffcoat @BrentJeffcoat 11h  
Definitely.

#PureAwarenessOWL #FirstDoNoHarm #13h  
Shared a Tweet

This request looks like it might be automated. To protect our users from spam and other malicious activity, we can't complete this action right now. Please try again later.

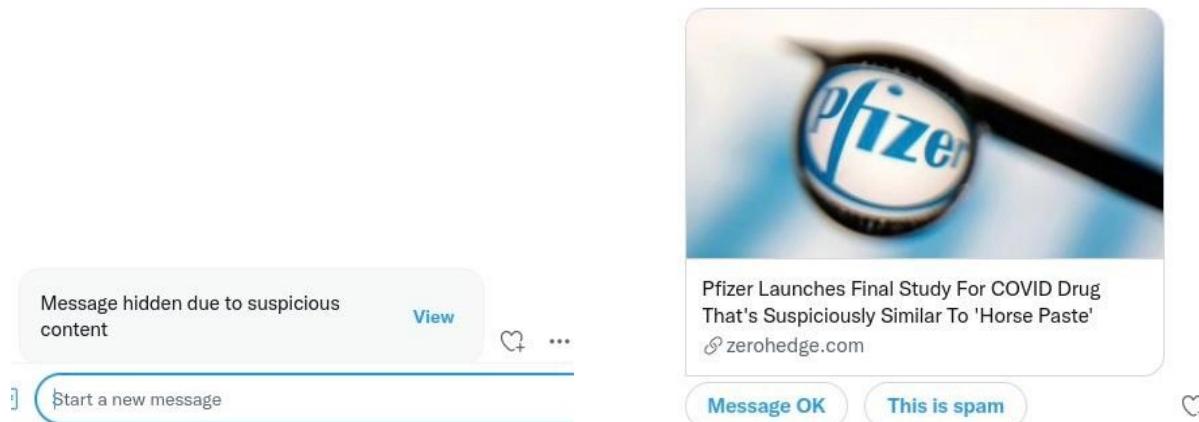
Africa must remove barriers to flying to secure post-pandemic boom, says IATA regional exec  
cnn.com

https://articles.mercola.com/sites/articles/archive/2021/08/04/why-im-deleting-all-content-after-48-hours.aspx

Message failed to send  
Delete for you · Try again

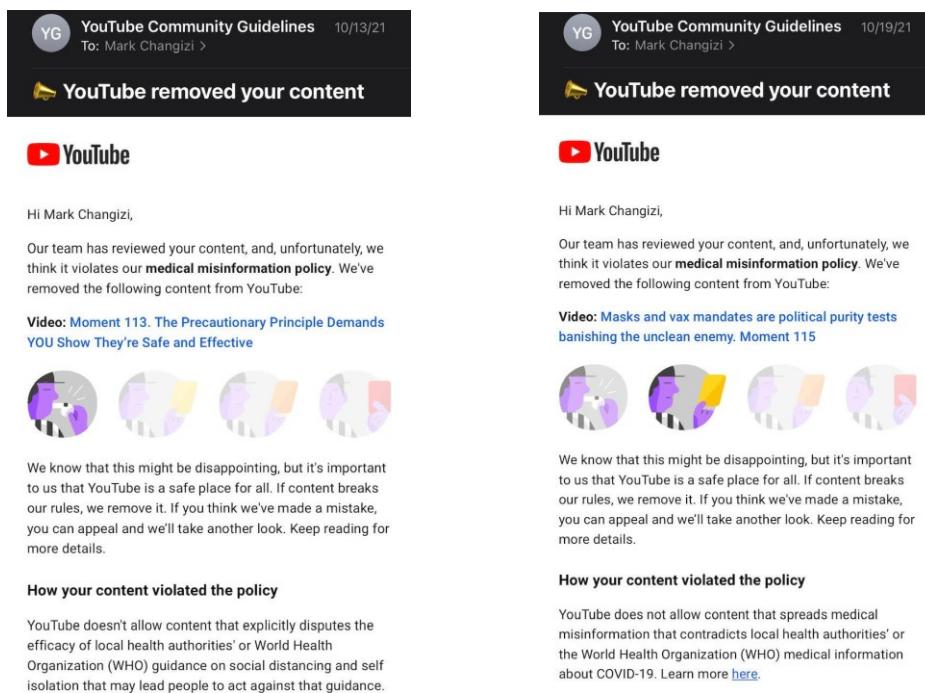
34. Twitter also censors direct messages in a distinct fashion, labeling the message “suspicious” (first image below) and requiring one to click through to see the actual message

(second image). This DM censorship occurred around the first of October, 2021.

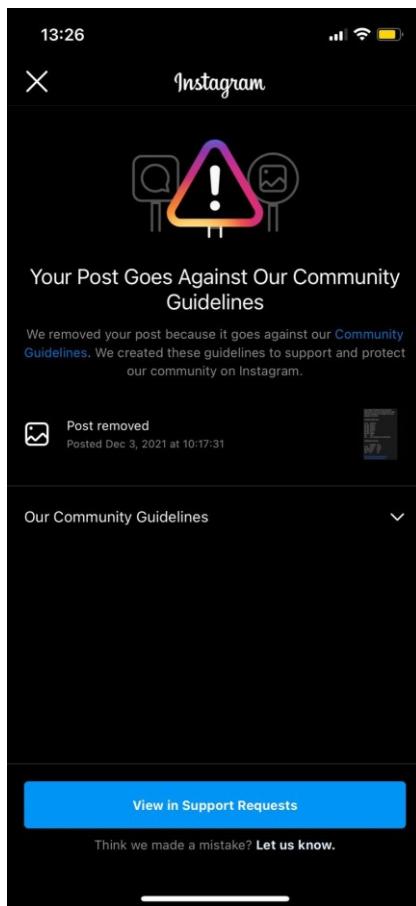


35. Censorship in Twitter's DMs were a surprise to all of us at Twitter. We had not ever seen censorship among our private messages in the decade plus years before then.

36. Two of my YouTube videos have been censored, one on the meaning of the Precautionary Principle (left), and the other on the evolution of political purity tests (right).



37. One of my posts at Instagram was taken down on December 6, 2021. The post cited the infection fatality rate of Covid for each age bracket, and compared it with that of flu.

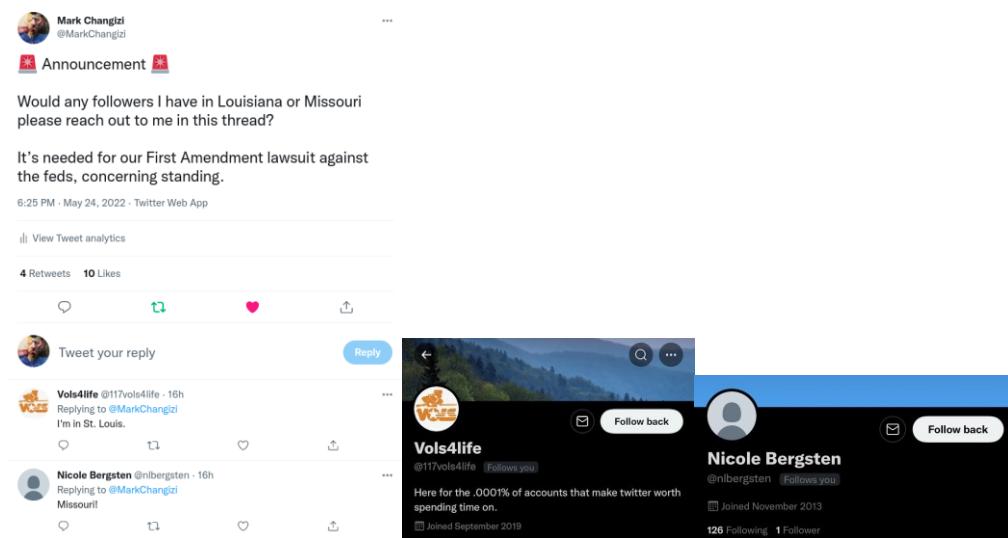


### Infection fatality rate

|        |                              |
|--------|------------------------------|
| 0-19:  | 0.0027%                      |
| 20-29: | 0.014%                       |
| 30-39: | 0.031%                       |
| 40-49: | 0.082%                       |
| 50-59: | 0.27%                        |
| 60-69: | 0.59%                        |
| 70+:   | 5.5%                         |
| 70+:   | 2.4% among non-institutional |

|         |                   |
|---------|-------------------|
| COVID19 | FLU               |
| 0-19:   | 0.003%      0.01% |
| 20-49:  | 0.02%      0.02%  |
| 50-69:  | 0.5%      0.1%    |
| 70+:    | 5%      1%        |

38. I have followers worldwide, including Louisiana and Missouri (see screenshots below).



39. I have become very careful about what I say on Twitter and YouTube (and Facebook and Instagram) to avoid suspension.

40. For example, I never discuss early treatments, as that leads to immediate suspensions.

41. I avoid linking to studies and make very general statements when referring to the vaccines and early treatments, which make my Tweets more difficult to comprehend.

42. I fear engaging with the opposition because angry opponents may report me to Twitter, increasing the chances of suspension.

43. I have documented my belief that the Government is heavily involved in, if not responsible for, big tech censorship.

44. On January 5, 2021 I tweeted that “IT’S ACTUALLY GOVERNMENT CENSORSHIP. Much of the reason why big tech is engaged in censorship is pressure from government itself, and so the premiss [*sic*] at the start of this thread is false. They’re not acting as a private company, but are a *de facto* arm of the state” (Attachment 12).

45. I tweeted a video of Press Secretary Jen Psaki’s May 5, 2021 speech on that date, and remarked: FREE EXPRESSION ALERT! Amazing! She specifically threatens Big Tech here to censor or risk greater regulation” (Attachment 13).

46. I wrote an article in July 5, 2021 entitled “Big Tech Censorship is Actually Government Censorship.” Available at <https://www.getrevue.co/profile/markchangizi/issues/big-tech-censorship-is-actually-government-censorship-597190>. I cited Jen Psaki’s May 5, 2021 talk, and concluded that “[i]t’s government censorship, plain and simple.”

47. On September 20, 2021 I Tweeted Psaki’s statement that “You shouldn’t be banned from one platform and not others for providing misinformation” and commented “Your federal government who is totally not directing Big Tech censorship and thereby violating the First Amendment” (Attachment 14).

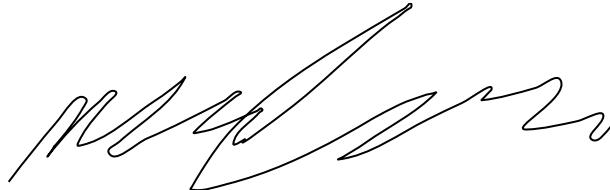
48. I use a wide variety of tech platforms, including Twitter, YouTube, Facebook, Instagram, Google, Signal, Telegram, Messenger, Amazon, Whatsapp, GETTR, Gab, Parler, TruthSocial.

49. I have always been under the assumption that my information is private, and certainly not available to the government without a warrant.

50. Twitter notoriously suspends only those who question the wisdom and efficacy of government restrictions, or who cast doubt on the safety or efficacy of the vaccines.

51. Upon information and belief, there are no examples of Twitter suspending individuals who have spread misinformation from the other side—by, for example, exaggerating the efficacy of masks or the threat the virus poses to children.

I swear or affirm under penalty of perjury that the foregoing is true and correct.



Executed on: May 25, 2022

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Mark Changizi